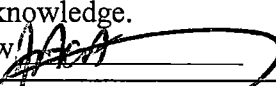



CRIMINAL COMPLAINT

United States District Court	DISTRICT OF ARIZONA
United States of America	DOCKET NO.
v.	MAGISTRATE'S CASE NO.
Amenity Nizhoni Jake ; DOB: 2001; United States Trey Augustus Store ; DOB: 1997; United States	20-08527MJ
Complaint for violation of Title 8, United States Code §§ 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i); 1325; 18 USC § 3	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:	
<p>COUNT 1 (Felony) On or about February 22, 2020, in the District of Arizona, Amenity Nizhoni Jake and Trey Augustus Store, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport a certain illegal alien, namely Edison Guachichullca-Juela, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A); 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).</p> <p>COUNT 2 (Misdemeanor) On or about February 22, 2020, in the District of Arizona, Amenity Nizhoni Jake and Trey Augustus Store, knowing that a certain illegal alien, Edison Guachichullca-Juela, had entered the United States at a time or place other than as designated by immigration officers, did knowingly assist Edison Guachichullca-Juela so that he would not be apprehended by law enforcement by transporting him in the vehicle that Amenity Nizhoni Jake was driving; in violation of Title 8, United States Code, Section 1325(a)(1) and Title 18 United States Code, Section 3.</p>	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:	
<p>On or about February 22, 2020, near Whetstone, in the District of Arizona, United States Border Patrol Agents (BPA) began following a 1994 Toyota Camry that passed their location at a high rate of speed. BPAs observed one of the passengers wearing camouflage clothing. The driver slowed down below the posted speed limit, and swerved over the center line several times. BPA conducted a traffic stop, and in the vehicle was the driver, Amenity Nizhoni Jake, the passenger, Trey Augustus Store, a male passenger wearing camouflage, identified as Edison Guachichullca-Juela, a female passenger, and two children, who were not in car seats. Both Jake and Store stated they "just picked them up." When asked if they were illegal aliens, Jake stated "I think so, probably." The adult passengers admitted they are citizens of Ecuador, in the country illegally.</p> <p>The material witness, Edison Guachichullca-Juela, stated he paid for the arrangements to be smuggled into the country illegally. Edison Guachichullca-Juela stated after crossing into the country, they were guided to a pickup location, where a vehicle arrived, driven by Amenity Nizhoni Jake. Guachichullca-Juela stated the passenger, Trey Augustus Store, was the one who told him and his family to get into the vehicle. The material witness stated the vehicle made no stops until they were pulled over.</p>	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: Edison Guachichullca-Juela	
Detention Requested	SIGNATURE OF COMPLAINANT
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	OFFICIAL TITLE & NAME:
AUTHORIZED BY: AUSA JAA/lmw 	U.S. Border Patrol Agent
Sworn to before me and subscribed in my presence	
SIGNATURE OF MAGISTRATE JUDGE 	DATE: February 24, 2020